

# **EXHIBIT D**

**Evelyn Fuentes-Rivera**

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**From:** Failla, John E. <jfailla@proskauer.com>  
**Sent:** Thursday, April 14, 2022 9:56 PM  
**To:** Luciana P. Lalande; Pastor, Sherilyn; Alladi, Om V.; Lander, Nathan R.; Suzanne Midlige; Kevin Coughlin; dsatine@saiber.com; jschiavone@saiber.com; skelly@moodklaw.com; mbrown@moodklaw.com; David Wilford; Anthony D'Agostino; dlayden@hangley.com; Brown, Thomas N.; rps@hangley.com; jleonard@saiber.com; rbenjamin@kbrlaw.com; pstoltz@kbrlaw.com; Briana A. Semenza; jvukelj@daypitney.com; Sabina Danek; Schiller, Ronald P.  
**Subject:** RE: Valeant Pharmaceuticals Int'l. Inc., et al. v. AIG Ins. Co. of Canada, et al.

Luciana,

Thank you for your note. I apologize for the delay as I have been traveling all week. I will get back to you on search terms tomorrow. On the settlement agreement point, Plaintiffs offer the following proposal to fully resolve Defendants' motion to compel production of the AIG/AWAC settlement agreement and shall be deemed to satisfy fully Defendants' Requests for Production of that document.

Plaintiffs offer to produce a redacted version of the AIG/AWAC Confidential Settlement Agreement and Mutual Release which redacts all provisions and sections other than the following (which will confirm full exhaustion of the 2013-14 AIG and AWAC policies): Recitals, Defined Terms which relate to the Allergan Claims (with Stock Drop terms redacted), Settlement Payments only for the 2013 Policies and/or the Allergan Claims, Mutual Releases, Dismissal with Prejudice, Exhaustion of 2013 Policies, Confidentiality, and Covenant Not to Sue. This document shall be subject to the full protection of the Confidentiality Order in this case.

Please let us know if this is acceptable to Defendants and we will include necessary language in the Stipulation. Thanks.

Best regards,

John

**John E. Failla**  
Partner  
Head, Insurance Recovery and Counseling

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**From:** Luciana P. Lalande <llalande@cmg.law>  
**Sent:** Monday, April 11, 2022 9:23 PM  
**To:** Failla, John E. <jfailla@proskauer.com>; Pastor, Sherilyn <spastor@mccarter.com>; Alladi, Om V. <OAlladi@proskauer.com>; Lander, Nathan R. <NLander@proskauer.com>; Suzanne Midlige <SMidlige@cmg.law>; Kevin Coughlin <KCoughlin@cmg.law>; dsatine@saiber.com; jschiavone@saiber.com; skelly@moodklaw.com; mbrown@moodklaw.com; David Wilford <dwilford@wilfordllp.com>; Anthony D'Agostino <adagostino@wilfordllp.com>; dlayden@hangley.com; Brown, Thomas N. <tnb@hangley.com>; rps@hangley.com;